



Handley Farah & Anderson PLLC

November 1, 2021

VIA ECF

Honorable Valerie E. Caproni
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 240
New York, NY 10007

Re: Belle, et al., v. City of New York, et al., 19 CV 2673 (VEC) (BM)

Dear Judge Caproni:

The parties respectfully submit this joint update in accordance with the Court's June 21, 2019 Order (ECF No. 18).

Over the past month, the parties have taken the following actions to further the litigation:

- On October 8, Plaintiffs provided their Rule 408 settlement letter to Defendants.
- On October 25, in response to Defendants' request for a more detailed breakdown of Plaintiffs' attorneys' fees to date – specifically, the number of hours worked and the year of law school graduation for each attorney working on the case – Plaintiffs provided this breakdown.
- Defendants are reviewing Plaintiffs' settlement demands and expect to be in a position to respond to Plaintiffs by November 15.
- The parties anticipate advising this Court shortly after November 15 whether they seek a settlement conference with Magistrate Judge Moses.

Thank you for your consideration of this matter.

Respectfully submitted,

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